

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Developing a Unified Intercarrier)	CC Docket No. 01-92
Compensation Regime)	
)	

REPLY COMMENTS OF GVNW CONSULTING, INC.

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Executive Summary

Rural carriers are different than non-rural carriers and face a different paradigm that must be considered in any policy evaluation. GVNW does not support the proposals made by the Intercarrier Compensation Forum (ICF) to implement what amounts to a bill and keep regime, as it would create severe impacts on rural carrier customers. We support the Rural Alliance principles and action matrix that are geared to meeting the needs of rural Americans.

The comment round filing aggregated data serves to mask the impact on an individual company basis, and concomitantly the impact on certain individual rural customers. For purposes of these reply comments, we have conducted a sample of 97 individual companies (68 with the company name displayed and 29 with the company identity masked) in order to calculate the impact on an individual company basis of the ICF proposal for intercarrier compensation reform.

The proposed ICF impact for INDIVIDUAL CARRIERS (not treated as the ICF comment filing that reflected in a “single entity” the entire rate of

return segment of the industry) ranged from a \$4.08 to \$823.63 shift per line per month from access to either the end user customer or to support mechanisms. In the sample, seven of the study areas had an impact of over \$100.00 per line per month, with the average impact per line per month for the 97 companies in the sample totaling \$32.26.

INTRODUCTION AND BACKGROUND

GVNW Consulting, Inc. (GVNW) is a management consulting firm that provides a wide variety of consulting services, including regulatory and advocacy support on issues such as universal service, advanced services, and access charge reform for communications carriers in rural America. The purpose of these reply comments is to respond to the Further Notice of Proposed Rulemaking (FNPRM) released by the Commission on March 3, 2005.

In this instant FNPRM, the Commission states at page 2 that it “begins the process of replacing the myriad [of] existing intercarrier compensation regimes with a unified regime designed for a market characterized by increasing competition and new technologies.” We applaud

the Commission's current efforts to address the myriad of challenges facing intercarrier compensation today.

As we will demonstrate in this reply comment filing, rural carriers are different than non-rural carriers and face a different paradigm that must be considered in any policy evaluation. GVNW does not support the proposals made by the Intercarrier Compensation Forum (ICF) to implement what amounts to a bill and keep regime, as it would create severe impacts on rural carrier customers. We support the Rural Alliance principles and action matrix that are geared to meeting the needs of rural Americans.

We respectfully submit these reply comments for the Commission's consideration. References to individual comments in these replies are noted by referencing the name and page number as paginated in the FCC website copy.

THE ICF PROPOSAL FOR INTERCARRIER COMPENSATION REFORM WOULD PRODUCE UNACCEPTABLE END USER IMPACTS ON AN INDIVIDUAL COMPANY BASIS

In the comment round, several parties provided some impact data that addressed their individual company circumstances¹, as well as aggregated data stratified by sample size². While each type of data set is instructive, the

¹ See, for example, Century Tel at page 12.

² See, for example, NECA comments at pages 5-11. In a less compelling example, the ICF in its filing at Appendix B-3 grossly assumed that the "ROR companies are modeled as a single entity, which consists of NECA [companies] and the other ROR companies . . ."

aggregated data serves to mask the impact on an individual company basis, and concomitantly the impact on certain individual rural customers.

For purposes of these reply comments, we have conducted a sample of 97 individual companies (68 with the company name displayed and 29 with the company identity masked) in order to calculate the impact on an individual company basis of the ICF proposal for intercarrier compensation reform. The purpose of our analysis was to determine the potential impact of shifting costs from IXC's to end users and support funds under the ICF proposal. Our focus was to determine the impact on individual company basis in order to determine the range of impacts on a per line per month basis for the individual companies in the sample in order to determine whether a fundamental public interest test³ is met.

Overview of Methodology and Assumptions

The price out used access revenues from IXC's determined by using the following to replicate the ICF proposal:

- Interstate Switched Access Revenue Requirements less amount received from support mechanisms

³ In its comment filing at footnote 14, GCI appears to confuse its self-interest with one of the cornerstones of prudent public policy, the test of meeting the public interest. GCI erroneously strives to convince the reader that public interest tests should be confined to ETC proceedings. GCI fails miserably to posit a sustainable argument. While GCI has indeed been the beneficiary of a number of decisions in Alaska that fail to meet a public interest test, we believe that rationality will still prevail in the federal jurisdiction.

- Intrastate Switched access using revenue requirements if the company filed periodic state access rates using current cost. If periodic tariffs were not filed, we used accounting records to determine access revenues from IXCs.

Access revenues from IXCs under the ICF plan assumed the following:

- Tandem Transit Revenue and Interconnection Transport Revenue are deemed insignificant for our rural ILEC clients, so we used zero for these revenues.
- CRTC Terminating Transport Charge Revenues used a default value of 10% of transport revenue requirement.

As shown in Appendix A, the difference between the current access revenues from IXCs and the minimal access revenues under the ICF proposal will be shifted to the end users or support mechanisms. The total support being shifted was converted to a per line per month amount by dividing the total loss in access revenue by the number of loops, and then dividing this result by twelve. As one would expect for smaller carriers with fewer customers, the monthly per-line shift amounts are larger for the smallest carriers in the sample.

The following table summarizes the stratification of the results found in Appendix A. The proposed ICF impact for INDIVIDUAL CARRIERS (not treated as the ICF comment filing that reflected in a “single entity” the entire rate of return segment of the industry) ranged from \$4.08 to \$823.63 shift per

line per month from access to either the end user customer or to support mechanisms. In the sample, seven of the study areas had an impact of over \$100.00 per line per month, with the average impact per line per month for the 97 companies in the sample totaling \$32.26⁴.

Number of 97 sample companies experiencing impacts of amounts ranging between \$x and \$y from ICF ICC Proposal	Amounts on a per customer per line per month basis of at least \$x and less than \$y
3	\$0 - \$10
13	\$10 - \$20
28	\$20 - \$30
21	\$30 - \$40
10	\$40 - \$50
5	\$50 - \$60
2	\$60 - \$70
2	\$70 - \$80
1	\$80 - \$90
5	\$90 - \$100
7	\$100 ++

⁴ These impacts may be slightly higher if the approach advocated by SBC Communications at page 8, footnote 8, were to be adopted. At footnote 8, SBC states in part: “the ICF plan avoids this problem by **eliminating access charges altogether.**” (**emphasis added**)

The data in Appendix A and summarized above effectively refutes the ICF claim in its filing found at page 29, footnote 44, concerning the “natural conclusion” of SLC creation. The rate impacts demonstrated on an individual company basis above, which ICF conveniently ignored with their “single entity ROR segment approach”, do not by any stretch of the imagination demonstrate a “natural” conclusion.

The empirical data presented in the Appendix and summarized in the table above underscores the real and significant deficiencies in the various bill and keep proposals.

Specific problems highlighted in the record formed by the initial comment filing round include, but are not limited to:

* *Bill and Keep Reflects Inefficient Competition.* As stated by NASUCA on page 47 of their comments: “The virtual elimination of usage as a cost component of ICC will create new uneconomic incentives for carriers to dump traffic on the networks of other carriers.”

* *Bill and Keep sends the wrong pricing signals.*⁵ The impacts of the Western Wireless proposal⁶ are more dramatic than the ICF proposal.

⁵ Indiana Utility Regulatory Commission (IURC), page 7, “Bill and Keep would not make the pricing signals more accurate; it would simply make them incorrect government-mandated price signals.”

⁶ Iowa Utilities Board (IUB), page 7, “Western Wireless . . . approach . . . would be financially disastrous for many rural telephone companies.”

** Bill and Keep alters, but does not remove the regulatory burden.*

Despite the claims asserted by various parties that bill and keep is deregulatory in nature, others properly assert that this is not the case⁷.

THERE IS A LOGICAL PROGRESSION TO THE TASKS THAT THE COMMISSION SHOULD ADDRESS FOR INTERCARRIER COMPENSATION REFORM

The Rural Alliance reply filing proposes a timetable for rational intercarrier compensation reform. We support and endorse this type of approach and respectfully submit this portion of our reply comments designed to supplement and support the Rural Alliance intercarrier compensation reform timeline.

There are a number of items that may be addressed prior to convening a Joint Board

A realistic approach to what may be accomplished in the short term is best pursued under a CARE protocol: Clarify existing rules; Address key

⁷ IURC, page 7: “Bill-and-Keep requires regulatory intervention for its very existence” , during a refutation of FNPRM Appendix C.

issues; **R**estrict certain abuses by specific parties; and **E**nforce existing rules.

In the filed comments, several parties⁸ addressed the need for the Commission to enforce or clarify certain of its existing rules and regulations and provide well-documented discussions of these topics. We concur with these needs and offer the following specific recommendations to the Commission:

Clarify existing rules in a competitively neutral manner.

1. With respect to interconnection, the Commission should clarify that POIs must be located within the LEC network area.

2. With respect to indirect connections, the Commission should clarify that LECs are not responsible for the delivery of traffic outside of their local service area.

Address key issues

1. The Commission should address the existing dial-up ISP exemption. We anticipate that the result will be to classify properly certain traffic that should be subject to interexchange access.

⁸ See, for example, Century Telecom, TDS, and NARUC version 7.

2. The Commission should address that under its existing rules that access charges should apply to terminating VoIP calls that utilize the public switched network.

Restrict certain abuses by specific parties

1. The Commission should restrict carriers that abuse the purpose and intent of the LERG by the establishment of virtual NXXs.

Enforce existing rules in a competitively neutral manner.

1. Enforce truth-in-labeling, and enforce the ability the Commission possesses under current regulation by permitting the blocking of any mislabeled traffic, but require that certain customer notification requirements be met prior to the blocking of any traffic. By enforcing truth-in-labeling requirements on all intercarrier and inter-network traffic, the traffic recipients will be able to bill the appropriate party for the termination of traffic that originates on another network and thus mitigate the problems that are created by “phantom traffic.”

2. Initiate an investigative and real-time resolution process. During the review process, the terminating carrier will be permitted to bill at the highest available rate pending the resolution of the dispute.

3. Enforce Truth in Billing rules that prohibit any means of altering, excluding, or stripping carrier and call identification information.

Certain tasks should be addressed within the context of a Joint Board proceeding

The Commission has an opportunity to walk a different path than the Commission's of the past decade. As preemption is opposed by a majority of parties, absent a Joint Board it is quite likely that a path of protracted litigation⁹ would occur, exacerbating the current disruption to intercarrier compensation and universal service.

The majority of commenters support a collaborative reform approach, asserting that the FCC and the states have joint responsibility for maintaining universal service. Within the Joint Board proceeding, we believe that intercarrier compensation rates must be unified at a positive rate. Further, states without a current state USF require a transition, with three years suggested by several parties¹⁰.

NETWORK INTERCONNECTION ISSUES

A large number of parties in this proceeding support the position that the point of interconnect between carriers should be at the discretion of the interconnecting carrier. It has been asserted by certain competitive LECs as well as CMRS providers that they should be allowed to negotiate agreements to connect to rural ILECs through a third party entity. However, it is important to note that any attempt to exclude the rural ILEC from

⁹ "This is a troubling aspect of a few of the proposals wherein certain pricing currently subject to the jurisdiction of the states would now be handled entirely at the federal level. Adoption of such a proposal would simply be asking for trouble – and one gigantic lawsuit." Wyoming Office of Consumer Advocate, page 3.

¹⁰ Iowa Utilities Board, page 3.

discussions that potentially impact the rural carriers' network does not comport with Section 251 of the rules. Further, as noted by the National Telecommunications Cooperative Association at page 42 of their filing, such an approach would also violate "the basic principles of contract law (offer, acceptance, and consideration)."

COST RECOVERY ISSUES

There are two cost recovery issues that require further comment in these replies.

Rural cost differences require a rural solution

A number of parties agreed with GVNW's premise that rural is different and that forward-looking models do not presently approximate reality for rural carriers.¹¹ If Section 254 outcomes were produced by a competitive market, then section 254 would be unnecessary.¹² In high cost to serve rural areas, a LEC incurs real costs at considerable risk: "Real networks, on the other hand, are constructed over time, subject to considerable uncertainties, and under carrier-of-last-resort obligations."¹³

Bill and Keep Creates a Confiscatory Paradigm

¹¹ "FLEC measures, such as HCPM, vary in inexplicable and inappropriate ways from embedded cost. . . the variability across states is large and does not follow any understandable pattern. The deviations do not depend on population density, state size, particular RBOCs, or any other factor . . . (Lehman Universal Service Joint Board ex parte June 2005, pages 1-2.)

¹² Ibid, page 1.

¹³ Comments before the Joint Board on Universal Service, Dale Lehman, June 7, 2005, Chicago, Illinois. (Lehman Universal Service Joint Board June, 2005), page 2.

In our GVNW comments at page 28, we express concern that “in no other business would retailers be allowed to service customers while using the property of another company without compensating the company providing the resources.” Several parties agree¹⁴. As the National Association of State Utility Consumer Advocates (NASUCA) states at page 32: “...proposals to move switched access rates to zero through adoption of a mandatory bill and keep system fall well below any reasonable estimate of the economic cost of interconnection.”

Respectfully submitted

Via ECFS on 7/20/05

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¹⁴ IURC, page 7, “We do not know of any other industry in which a company would routinely expect that, if it chose the ‘buy’ option rather than the ‘build’ option, it would not have to pay its wholesale suppliers for use of the supplier’s facilities or for services rendered.”

APPENDIX A

Company Name	Study Area	Period	Total Access From IXC's	Access From IXC's	Residual Access Rev.	Access Lines	Shift Per Line Per Month
1 Molalla Tel Co	532383	2003	\$ 972,274	\$ 6,310	\$ 965,964	7,136	\$ 11.28
2 Home Telephone Company	341032	2003	\$ 196,555	\$ 26,343	\$ 170,212	1,039	\$ 13.65
Stayton Cooperative Telephone 3 Company	532399	2003	\$ 1,539,121	\$ 12,640	\$ 1,526,481	8,664	\$ 14.68
4 McDonough Telephone Coop.	341047	2003	\$ 827,925	\$ 38,348	\$ 789,576	4,366	\$ 15.07
5 Canby Telephone Assn	532362	2003	\$ 2,382,309	\$ 69,988	\$ 2,312,321	12,032	\$ 16.02
6 Nemont Tel. Coop.	482247	2003	\$ 2,976,061	\$ 96,748	\$ 2,879,313	14,927	\$ 16.07
7 Moapa Valley Tel Co	552353	2003	\$ 916,964	\$ 29,857	\$ 887,107	4,057	\$ 18.22
Harrisonville Telephone 8 Company	341026	2003	\$ 4,766,958	\$ 152,949	\$ 4,614,009	19,846	\$ 19.37
9 CC Communications	552349	2003	\$ 3,394,092	\$ 10,109	\$ 3,383,984	14,446	\$ 19.52
10 Ganado	442076	2003	\$ 814,408	\$ 2,796	\$ 811,612	3,303	\$ 20.48
11 Range Tel. Coop. Inc.-WY	512251	2003	\$ 5,567,682	\$ 196,430	\$ 5,371,252	20,416	\$ 21.92
12 Scio Mutual Tel Co	532397	2003	\$ 526,795	\$ 2,969	\$ 523,826	1,914	\$ 22.81
13 Sierra Telephone Co., Inc.	542338	2003	\$ 6,957,227	\$ 141,210	\$ 6,816,017	24,322	\$ 23.35
14 Pioneer Tel. Cooperative	532393	2003	\$ 4,708,737	\$ 57,938	\$ 4,650,799	16,358	\$ 23.69
15 Laharpe Telephone Company	341043	2003	\$ 320,352	\$ 4,931	\$ 315,421	1,106	\$ 23.77
16 Chugwater Telephone Company	512289	2003	\$ 82,352	\$ 68	\$ 82,284	286	\$ 23.98

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17 Colton Telephone Co	532364	2003	\$	376,469	\$	2,112	\$	374,357	1,300	\$	24.00
18 Gervais Telephone Co	532373	2003	\$	357,371	\$	3,822	\$	353,549	1,222	\$	24.11
Clark Fork Telecommunications, 19 Inc.	483308	2003	\$	2,750,325	\$	31,863	\$	2,718,462	9,243	\$	24.51
Beaver Creek Coop. Tel. 20 Company	532359	2003	\$	1,427,441	\$	39,921	\$	1,387,520	4,580	\$	25.25
21 Mukluk Telephone Co. Inc.	613016	2003	\$	1,518,485	\$	7,729	\$	1,510,756	4,935	\$	25.51
22 Lincoln Tel. Co. Inc	482244	2003	\$	368,589	\$	11,879	\$	356,710	1,164	\$	25.54
23 West River Telecommunications	381637	2003	\$	5,807,978	\$	44,837	\$	5,763,141	16,806	\$	28.58
24 Hardy Telecommunications	200259	2003	\$	1,244,354	\$	21,570	\$	1,222,784	3,470	\$	29.37
25 Oregon Tel Co	532389	2003	\$	711,149	\$	27,878	\$	683,271	1,918	\$	29.69
26 Kalona Cooperative Tele. Co.	351214	2003	\$	757,306	\$	13,262	\$	744,044	2,070	\$	29.95
27 Tularosa Basin	492265	2003	\$	1,916,551	\$	11,322	\$	1,905,230	5,192	\$	30.58
28 Bristol Bay Tel. Coop. Inc.	613003	2003	\$	688,059	\$	11,164	\$	676,895	1,826	\$	30.89
29 Ponderosa Telephone Company	542332	2003	\$	3,906,716	\$	51,159	\$	3,855,557	10,085	\$	31.86
30 Central Montana	483310	2003	\$	3,347,354	\$	75,519	\$	3,271,835	8,260	\$	33.01
31 Interior Telephone Co. Inc. The Siskiyou Telephone 32 Company	613011	2003	\$	3,695,126	\$	19,032	\$	3,676,094	9,100	\$	33.66
33 Blackfoot Tel. Coop.	542339	2003	\$	2,387,263	\$	263,353	\$	2,123,910	5,190	\$	34.10
34 McDonald County Tele Co	482235	2003	\$	3,994,077	\$	85,982	\$	3,908,095	9,429	\$	34.54
35 North State Tel Co	421912	2003	\$	1,769,684	\$	8,824	\$	1,760,860	4,195	\$	34.98
36 Citizens Telephone Company	532388	2003	\$	257,109	\$	14,000	\$	243,109	574	\$	35.29
37 Grand River Mutual, Missouri	421865	2003	\$	1,740,243	\$	13,998	\$	1,726,245	4,071	\$	35.34
38 Dubois Tel. Exch. Inc.	421888	2003	\$	6,396,175	\$	146,650	\$	6,249,525	14,559	\$	35.77
39 United Utilities	512291	2003	\$	1,069,845	\$	23,138	\$	1,046,707	2,412	\$	36.16
40 Range Tel. Coop. Inc.-MT	613023	2003	\$	6,029,226	\$	284,193	\$	5,745,033	13,120	\$	36.49
41 Otz Telephone Coop. Inc.	482251	2003	\$	2,275,909	\$	88,964	\$	2,186,946	4,955	\$	36.78
42 Polar Communications	613019	2003	\$	1,844,697	\$	500	\$	1,844,197	4,155	\$	36.99
43 Roosevelt	381630	2003	\$	3,980,433	\$	141,556	\$	3,838,877	8,587	\$	37.25
44 Table Top Telephone Company	492272	2003	\$	1,084,714	\$	11,963	\$	1,072,751	2,370	\$	37.72
45 UBTA/UBET	453334	2003	\$	2,543,914	\$	35,353	\$	2,508,561	5,486	\$	38.11
46 Copper Valley Tel. Coop. Inc	502287	2003	\$	9,162,770	\$	65,117	\$	9,097,653	19,851	\$	38.19
47 Mt. Angel Telephone Company	613006	2003	\$	3,378,093	\$	21,739	\$	3,356,354	6,853	\$	40.81
48 Kingdom Telephone Company	532386	2003	\$	1,015,222	\$	2,000	\$	1,013,222	2,058	\$	41.03
49 Humboldt Telephone Company	421901	2003	\$	2,895,185	\$	104,751	\$	2,790,434	5,580	\$	41.67
50 Triangle Tel. Coop. Assn Inc.	533304	2003	\$	623,937	\$	30,456	\$	593,481	1,083	\$	45.67
51 Monitor Tel. Coop Lincoln County Telephone 52 System, Inc.	482257	2003	\$	6,674,835	\$	284,591	\$	6,390,244	11,080	\$	48.06
53 Filer Mutual Telephone - Idaho Filer Mutual Telephone - 54 Nevada	532384	2003	\$	445,798	\$	5,856	\$	439,942	762	\$	48.11
55 Monroe	552351	2003	\$	1,617,449	\$	45,476	\$	1,571,973	2,647	\$	49.49
56 Southern Montana Tel. Co.	472220	2003	\$	1,360,373	\$	28,003	\$	1,332,370	2,160	\$	51.40
57 Pine Tel. System	552220	2003	\$	441,441	\$	13,708	\$	427,733	663	\$	53.76
58 Helix Tel. Co.	532385	2003	\$	658,787	\$	14,014	\$	644,773	985	\$	54.55
59 Bush-Tell, Inc.	482254	2003	\$	859,815	\$	53,238	\$	806,577	1,162	\$	57.84
60 Roome Telecommunication Inc.	532392	2003	\$	835,169	\$	11,015	\$	824,154	1,150	\$	59.72
	532376	2003	\$	282,197	\$	9,714	\$	272,483	349	\$	65.06
	613004	2003	\$	943,283	\$	1,866	\$	941,417	1,047	\$	74.93
	532375	2003	\$	701,237	\$	2,359	\$	698,878	692	\$	84.16

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Grand River (Ia) & South										
61 Central		351888	2003	\$	2,807,008	\$	81,066	\$	2,725,942	2,487 \$ 91.34
62 Oregon-Idaho Utilities, Inc.		532390	2003	\$	925,321	\$	42,026	\$	883,295	780 \$ 94.37
Egyptian Telephone										
63 Cooperative		341003	2003	\$	4,049,774	\$	53,585	\$	3,996,189	3,479 \$ 95.72
64 Dell-NM		492066	2003	\$	659,657	\$	67,686	\$	591,972	478 \$ 103.20
65 Baca Valley		492259	2003	\$	1,131,378	\$	13,381	\$	1,117,997	874 \$ 106.60
66 Eagle Tel. System Inc.		532369	2003	\$	744,572	\$	11,800	\$	732,772	483 \$ 126.43
67 Dell-Tx		442066	2003	\$	1,349,856	\$	95,222	\$	1,254,634	817 \$ 127.97
Direct Communications-										
68 Rockland		472232	2003	\$	3,181,616	\$	265,170	\$	2,916,446	1,293 \$ 187.96
69 A	A		2003	\$	545,795	\$	18,974	\$	526,821	10,756 \$ 4.08
70 B	B		2003	\$	48,938	\$	5,294	\$	43,644	834 \$ 4.36
71 C	C		2003	\$	293,578	\$	2,345	\$	291,233	3,836 \$ 6.33
72 D	D		2003	\$	77,842	\$	1,867	\$	75,975	547 \$ 11.57
73 E	E		2003	\$	731,597	\$	16,197	\$	715,400	3,733 \$ 15.97
74 F	F		2003	\$	226,806	\$	17,399	\$	209,407	897 \$ 19.45
75 G	G		2003	\$	2,043,248	\$	20,121	\$	2,023,127	8,523 \$ 19.78
76 H	H		2003	\$	443,923	\$	29,302	\$	414,621	1,651 \$ 20.93
77 I	I		2003	\$	1,231,748	\$	6,062	\$	1,225,686	4,872 \$ 20.96
78 J	J		2003	\$	905,783	\$	13,739	\$	892,044	3,342 \$ 22.24
79 K	K		2003	\$	367,355	\$	7,815	\$	359,540	1,329 \$ 22.54
80 L	L		2003	\$	1,462,406	\$	74,410	\$	1,387,996	5,034 \$ 22.98
81 M	M		2003	\$	714,724	\$	5,499	\$	709,225	2,553 \$ 23.15
82 N	N		2003	\$	594,342	\$	7,247	\$	587,095	2,078 \$ 23.54
83 O	O		2003	\$	796,031	\$	5,654	\$	790,377	2,704 \$ 24.36
84 P	P		2003	\$	173,268	\$	298	\$	172,970	564 \$ 25.56
85 Q	Q		2003	\$	924,547	\$	8,970	\$	915,577	2,973 \$ 25.66
86 R	R		2003	\$	406,907	\$	10,972	\$	395,935	1,214 \$ 27.18
87 S	S		2003	\$	2,768,089	\$	2,554	\$	2,765,535	7,018 \$ 32.84
88 T	T		2003	\$	273,884	\$	1,508	\$	272,376	604 \$ 37.58
89 U	U		2003	\$	284,982	\$	1,381	\$	283,601	548 \$ 43.13
90 V	V		2003	\$	3,979,973	\$	52,021	\$	3,927,952	7,475 \$ 43.79
91 W	W		2003	\$	4,141,628	\$	74,986	\$	4,066,642	6,875 \$ 49.29
92 X	X		2003	\$	311,935	\$	9,283	\$	302,652	373 \$ 67.62
93 W	W		2003	\$	1,189,218	\$	11,152	\$	1,178,067	1,400 \$ 70.12
94 Z	Z		2003	\$	129,463	\$	3,291	\$	126,172	110 \$ 95.59
95 AA	AA		2003	\$	245,950	\$	4,220	\$	241,731	203 \$ 99.23
96 AB	AB		2003	\$	1,538,466	\$	6,383	\$	1,532,083	1,256 \$ 101.65
97 AC	AC		2003	\$	11,192,407	\$	854,192	\$	10,338,215	1,046 \$ 823.63